

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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VDARE FOUNDATION, INC.,	:
	:
Plaintiff,	:
	:
- vs -	:
	:
LETITIA JAMES, in her official capacity as	:
Attorney General of the State of New York,	:
	:
Defendant.	:
	:
	:
	:
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Civil Action No. 22-cv-1337 (FJS/CFH)

**DECLARATION OF
CASSIDY S. CURRAN**

I, Cassidy S. Curran, hereby declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify thereto.

2. I am a Paralegal employed at the law firm of Randazza Legal Group, PLLC (“RLG”), counsel for Plaintiff in the above-captioned matter.

3. I submit this Declaration in support of Plaintiffs’ Reply in Support of Plaintiff’s Motion for a Preliminary Injunction (“Reply”).

4. On April 20, 2023, at 12:21 P.M. Eastern Time, while at the Massachusetts office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited the New York NYSCEF web page at the URL: https://iapps.courts.state.ny.us/nyscef/ViewDocument?docIndex=XD_PLUS_mVacmNGwyDeFRX/sQlg==. Immediately after visiting this page, I used the Google Chrome print to PDF function. A true and correct copy of this document, which is the Memorandum of Law in Support of the Attorney General’s Special Proceeding and Application to Compel Respondent VDARE Foundation, Inc. to Comply with an Investigatory

Subpoena, in the matter of *James v. VDare Foundation*, Index No. 453196/2022 (N.Y. Sup. Ct. filed Dec. 16, 2022), is attached hereto as **Exhibit A**.

5. On April 20, 2023, at 1:11 P.M. Eastern Time, while at the Massachusetts office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited the KKTV 11 News article entitled “VDARE responds to conference cancellation at Cheyenne Mountain Resort” at the URL: <https://www.kktv.com/content/news/Mayor-Suthers-responds-to-planned-VDARE-conference-in-Colorado-Springs-440537563.html>. Immediately after visiting this page, I used the Google Chrome print to PDF function. A true and correct copy of this document is attached hereto as **Exhibit B**.

6. On April 20, 2023, at 1:15 P.M. Eastern Time, while at the Massachusetts office of RLG and using the Safari browser on a MacBook Air laptop, I visited The Washington Post article entitled “Resort cancels ‘white nationalist’ organization’s first-ever conference over the group’s views” at the URL: <https://www.washingtonpost.com/news/post-nation/wp/2017/01/26/a-resort-canceled-a-white-nationalist-groups-first-ever-conference-because-of-its-views/>. Immediately after visiting this page, I used the Safari browser print to PDF function. A true and correct copy of this document is attached hereto as **Exhibit C**.

7. On April 20, 2023, at 1:16 P.M. Eastern Time, while at the Massachusetts office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited the VDARE article entitled “Cancelled Tucson Conference Produces Five-Figure Settlement – VDARE.com To Announce New Venue Soon!” at the URL: <https://vdare.com/articles/cancelled-tucson-conference-produces-five-figure-settlement-vdare-com-to-announce-new-venue-soon>. Immediately after visiting this page, I used the web page’s print function. A true and correct copy of this document is attached hereto as **Exhibit D**.

8. On April 20, 2023, at 1:32 P.M. Eastern Time, while at the Massachusetts office of RLG and using the Safari browser on a MacBook Air laptop, I visited The Washington Post article entitled "A 'hate castle' or welcome neighbor? VDare divides a West Virginia town." at the URL: <https://www.washingtonpost.com/dc-md-va/2023/01/03/vdare-berkeley-springs-castle-brimelow/>. Immediately after visiting this page, I used the Safari browser print to PDF function to save both the article and comments. A true and correct copy of this document is attached hereto as **Exhibit E**.


9. Attached hereto as **Exhibit F** is a true and correct copy of the supplemental declaration of Lydia Brimelow.

10. Attached hereto as **Exhibit G** is a true and correct copy, as redacted for filing, of the affidavit of the VDARE.com pseudonymous writer "VDARE Lady Reader".

11. Attached hereto as **Exhibit H** is a true and correct copy, as redacted for filing, of the affidavit of the VDARE.com pseudonymous writer "Federale".

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 24, 2023



Cassidy S. Curran